

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-28 are pending in the application, with claims 1, 7, 13 and 19 being the independent claims. Claims 1, 7, 13, 19-21 and 25-27 have been amended. Each of the independent claims have been amended to further clarify that multiple pieces of content are combined into an email. Additionally, claims 7, 13 and 19 have been amended to clarify the Applicant's intent that the system may generate more than a single email. Dependent claims 20, 21 and 25-27 have been amended to maintain consistency with the independent claims. Descriptive support for the amendment is found in the specification as filed. The amendment is believed to introduce no new matter, and its entry is respectfully requested.

Claims 1, 2, 7, 8, 13, 14, 19, 20 and 25-28 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2001/0032137 to Bennett, *et al.* (hereinafter, "Bennet"). Claims 3, 4, 9, 10, 15, 16, 21 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bennett in view of U.S. Patent No. 4,723, 212 to Mindrum (hereinafter, "Mindrum"). Claims 5, 11, 17 and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bennett in view of U.S. Patent No. 6,076,101 to Kamakura (hereinafter, "Kamakura"). Claims 6, 12, 18 and 24 stand rejected under 35 U.S.C. § 103(a) stand rejected as being unpatentable over Bennett in view of Kamakura and further in view of Mindrum.

Based on the above amendment and the following Remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and they be withdrawn.

I. Claims 1, 2, 7, 8, 13, 14, 19, 20 and 25-28 are Patentable over Bennett

Claims 1, 2, 7, 8, 13, 14, 19, 20 and 25-28 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2001/0032137 to Bennett, *et al.* (hereinafter, "Bennet"). For the following reasons, this rejection is respectfully traversed.

Claims 1 and 7 recite "generating [an] e-mail for the patrons, wherein the e-mail contains [] multiple pieces of content, each piece of content corresponding to a distinct campaign." Claim 13 recites "a processor programmed to . . . generate [an] e-mail for the patrons, wherein the e-

mail contains [] multiple pieces of content, each piece of content corresponding to a distinct campaign.” Claim 19 recites “a targeted e-mail application subsystem . . . adapted to merge each single piece of content matched to each of the plurality of patrons, so as to provide targeted e-mails, each targeted e-mail having multiple pieces of content for each of the plurality of patrons and each piece of content corresponding to a distinct campaign.”

Bennett discloses an information distribution and redemption system for creating and sending personalized e-mail messages. *See Abstract.* The system disclosed by Bennett may generate e-mail targeted to an interested subset of a merchant’s patrons. *See ¶¶ 0008-0009.* However, Bennett fails to disclose generating an e-mail for each one of a plurality of patrons wherein the e-mail contains multiple pieces and each piece of content corresponds to a distinct campaign.

Rather, the system disclosed by Bennett is precisely the type of prior art method specifically acknowledged in the present invention as being improved upon. *See Specification, p.2, line 2 to p.3, line 1.* For example, the system disclosed by Bennett may permit a pet store to send an e-mail regarding cat food to cat owners and a separate, *different* e-mail regarding dog food to dog owners. *See ¶ 0009.* In other words, the content regarding cat food and the content regarding dog food may not be merged into a single e-mail for those patrons having both a cat and a dog. In contrast, in an analogous situation using the present invention, multiple pieces of content related to different campaigns such as cat food content and dog food content may be combined into a single e-mail and transmitted to those patrons known to own at least one cat and at least one dog. As such, Bennett fails to disclose combining multiple pieces of content, each corresponding to a distinct campaign, as recited by claims 1, 7, 13 and 19 of the present invention.

Because Bennett fails to disclose or suggest the claimed apparatus including “generating [an] e-mail for the patrons, wherein the e-mail contains [] multiple pieces of content, each piece of content corresponding to a distinct campaign,” as recited by claims 1 and 7, “a processor programmed to . . . generate [an] e-mail for the patrons, wherein the e-mail contains [] multiple pieces of content, each piece of content corresponding to a distinct campaign,” as recited by claim 13 and “a targeted e-mail application subsystem . . . adapted to merge each single piece of

content matched to each of the plurality of patrons, so as to provide targeted e-mails, each targeted e-mail having multiple pieces of content for each of the plurality of patrons and each piece of content corresponding to a distinct campaign,” as recited by claim 19, claims 1, 7, 13 and 19 are allowable over Bennett. Claims 2, 8, 14, 20 and 25-28 depend from one of claims 1, 7, 13 and 19 and are allowable for at least these reasons. Therefore, Applicants respectfully request that the Examiner withdraw the rejection of claims 1, 2, 7, 8, 13, 14, 19, 20 and 25-28.

II. Claims 3, 4, 9, 10, 15, 16, 21 and 22 are Patentable over Bennett in view of Mindrum

Claims 3, 4, 9, 10, 15, 16, 21 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bennett in view of U.S. Patent No. 4,723, 212 to Mindrum (hereinafter, “Mindrum”). For the following reasons, this rejection is respectfully traversed.

As discussed above, Bennett fails to disclose all features of independent claims 1, 7, 13 and 19, from which claims 3, 4, 9, 10, 15, 16, 21 and 22 depend. Mindrum does nothing to compensate for the illustrated deficiencies of Bennett.

Mindrum relates to an apparatus for printing coupons at a checkout terminal in a store. *See* col.1, ll.60-65. However, there is no mention in Mindrum of generating e-mail, let alone generating an e-mail containing multiple pieces of content, each piece of content corresponding to a distinct campaign. As such, Mindrum fails to cure the deficiencies of Bennett discussed above.

Because Mindrum fails to cure the deficiencies of Bennett discussed above, claims 1, 7, 13 and 19 are allowable over Bennett in view of Mindrum. Claims 3, 4, 9, 10, 15, 16, 21 and 22 depend from one of claims 1, 7, 13 and 19 and are allowable for at least these reasons. Therefore, Applicants respectfully request that the Examiner withdraw the rejection of claims 3, 4, 9, 10, 15, 16, 21 and 22.

III. Claims 5, 11, 17 and 23 are Patentable over Bennett in view of Kamakura

Claims 5, 11, 17 and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bennett in view of U.S. Patent No. 6,076,101 to Kamakura (hereinafter, “Kamakura”). For the following reasons, this rejection is respectfully traversed.

As discussed above, Bennett fails to disclose all features of independent claims 1, 7, 13 and 19, from which claims 3, 4, 9, 10, 15, 16, 21 and 22 depend. Kamakura does nothing to compensate for the illustrated deficiencies of Bennett.

Kamakura relates to a target e-mail system which seeks to encourage recipients to open e-mails and award rewards (such as bonus points) when a recipient opens an e-mail. *See Abstract.* However, there is no mention in Kamakura of generating an e-mail containing multiple pieces of content, each piece of content corresponding to a distinct campaign. As such, Kamakura fails to cure the deficiencies of Bennett discussed above.

Because Kamakura fails to cure the deficiencies of Bennett discussed above, claims 1, 7, 13 and 19 are allowable over Bennett in view of Kamakura. Claims 5, 11, 17 and 23 depend from one of claims 1, 7, 13 and 19 and are allowable for at least these reasons. Therefore, Applicants respectfully request that the Examiner withdraw the rejection of claims 5, 11, 17 and 23.

IV. Claims 6, 12, 18 and 24 are Patentable over Bennett in view of Kamakura and Mindrum

Claims 6, 12, 18 and 24 stand rejected under 35 U.S.C. § 103(a) stand rejected as being unpatentable over Bennett in view of Kamakura and further in view of Mindrum. For the following reasons, this rejection is respectfully traversed.

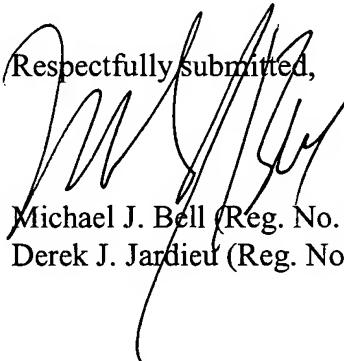
As discussed above, Bennett fails to disclose all features of independent claims 1, 7, 13 and 19, from which claims 6, 12, 18 and 24 depend. As further discussed above, both Kamakura and Mindrum individually fail to compensate for the illustrated deficiencies of Bennett.

Therefore, because Kamakura and Mindrum both fail to cure the deficiencies of Bennett discussed above, claims 6, 12, 18 and 24 are allowable over Bennett in view of Kamakura and Mindrum. Claims 6, 12, 18 and 24 depend from one of claims 1, 7, 13 and 19 and are allowable for at least these reasons. Therefore, Applicants respectfully request that the Examiner withdraw the rejection of claims 6, 12, 18 and 24.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete response has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Respectfully submitted,

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